

days from the time your application is received by a passport agency. This means you should receive your passport or denial letter within 3 weeks door-to-door."

<http://travel.state.gov/content/passports/english/passports/apply.html>.

10. Plaintiff also submitted substantial amounts of information and evidence as irrefutable evidence of his Identity and U.S. Citizenship.
11. Among other records, Plaintiff provided a copy of his Oklahoma Driver's License, his Social Security Card; his Selective Service Registration Card, a birth record, ordered and adjudged by the District Court of Tulsa County, State of Oklahoma, multiple DS-10 Birth Affidavit's, and early childhood medical and school records, all of which are identified by the Department of State as acceptable forms of evidence of U.S. Citizenship.
12. Plaintiff's application was assigned reference number 610032865.
13. After submitting his passport application and supporting documents, Plaintiff then applied for a "U.S. SENTRI Card."
14. After a background investigation and a personal interview of Plaintiff, the United States through its agency, U.S. Customs and Border Protections, concluded among other things, that Plaintiff is an United States citizen, and approved the issuance of a "SENTRI Card."
15. Then eighty-seven (87) days after submitting his passport application, the United States, Department of State, directly contrary to the U.S. Customs and Border Protections' position on Plaintiff's "SENTRI Card" application, in a letter dated September 5, 2013, indicated Plaintiff's *U.S. Citizenship evidence* was insufficient.
16. On September 23, 2013 Plaintiff was issued his "SENTRI Card," which clearly indicates that Plaintiff is a citizen of the United States of America.
17. Plaintiff provided a copy of his "SENTRI Card," to the U.S. Department of State as further proof that he is a citizen of the United States.
18. On September 18, 2014, after many months passed, Plaintiff filed this instant action.
19. On November 25, 2014 the U.S. Department of State issued a written denial.
20. Plaintiff was born in Tulsa, Oklahoma on October 9, 1988.
21. Plaintiff is a citizen of the United States and entitled to a passport.

WHEREFORE, Plaintiff prays for an order from this Court, directing Defendants to issue Plaintiff a U.S. Passport forthwith and to grant such other and further relief as it may deem necessary and proper, including attorney's fees and costs.

Respectfully Submitted,

By s/William D. Thomas

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